

EXHIBIT 6

REDACTED PURSUANT TO
APRIL 25, 2019 ORDER (ECF NO. 477)

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA

ELIZABETH SINES et al.,	:	CASE NO: 3:17cv00072
	:	(J. Moon, Magistrate J. Hoppe)
Plaintiff	:	
	:	
vs.	:	
	:	
JASON KESSLER et al.,	:	
	:	
Defendant	:	

**DEFENDANT NATHAN DAMIGO'S RESPONSES TO DEFENDANT'S FIRST
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS**

Now comes defendant Nathan Damigo and responds to defendants first set of Interrogatories and Request for Documents as follows:

I. DISCOVERY REQUESTS

1. Identify all means of communication used by you to communicate concerning the Events, whether before, during, or after the Events, and for each means of communication, identify all names, aliases, e-mail addresses, phone numbers, and Social Media Handles you used in connection with such communications, including the 18-digit account identifier associated with any Discord account used by You. Means of communications include, but are not limited to, telephone calls, in-person meetings, and all means of electronic communication including, for example, Social Media, email, SMS messages, podcasts, and online video.

ANSWER: Youtube:Username: [REDACTED]

URL: [REDACTED]

Twitter:

Handle: [REDACTED]

Username: [REDACTED]

URL: [REDACTED]

No longer have access to tweets. Deleted due to argument with girlfriend.

Facebook

Username: [REDACTED]

No longer have access to this account because Facebook deleted my account after Charlottesville.

Discord

Username: [REDACTED]

No longer have access to this account because Discord shut down my account after Charlottesville.

Slack

Username: [REDACTED]

Name: [REDACTED]

Slack Teams: [REDACTED]

2. Identify any "channel" or "server" on Discord to which you had access.

ANSWER: See above answer to #1.

3. Identify all persons (natural or non-natural) with whom you communicated concerning the Events, whether before, during, or after the Events.

ANSWER: Eli Moseley aka Elliott Kline.

4. Identify all Electronic Devices used by you to communicate concerning the Events, whether before, during, or after the Events.

**ANSWER: cellular phone [REDACTED],
e-mail [REDACTED]**

II. DOCUMENT REQUESTS

General Response: Mr. Damigo is in possession of certain texts and e-mails that are responsive. Due to technical difficulties he will be unable to turn these over until the week of April 9, 2018.

1. All Documents and Communications concerning the Events, including without limitation all documents and communications:
- i. concerning any preparation, planning, transportation to, or coordination for, the Events, including receipts, bills and credit card statements reflecting costs for transportation,

lodging, apparel, gear, or any other material purchased for the Events;
ii. concerning any instructions or coordination relating to the Events, including security details, what to wear, what to bring, when to meet, where to meet, what to say, and any other logistical information or arrangements;
iii. that are Social Media documents concerning the Events;
iv. you created during the Events, including Social Media, text messages, video, and photographs;
v. concerning African Americans, Jewish individuals, or other religious, racial, or ethnic minorities that relate in any way to the Events;
vi. concerning any statement or action attributed to You in the Amended Complaint; or
vii. concerning any allegation of an altercation, violent act, injury, or instance of intimidation or harassment that occurred during the Rally, including but not limited to James Fields' vehicular incident; or
viii. concerning any funding of the Events, including for transportation, housing, food, weapons, uniforms, signage, tiki torches, or other materials or services used in connection with the Events (or the planning thereof)..

ANSWER: See attached. In addition Mr. Damigo no longer has access to his twitter posts but, to the best of his knowledge, full and complete copies of those posts that would be responsive to any part of these discovery requests are contained at CanaryMission.org. Posts from that website are attached.

2. All Documents and Communications concerning events, meetings, rallies, conferences, or conversations held prior to the Events that relate to the Events in any way.

ANSWER: None.

3. All Documents concerning and all Communications concerning or with East Coast Knights of the Ku Klux Klan (or East Coast Knights of the True Invisible Empire), Fraternal Order of the AltKnights, Identity Europa (or Identity Evropa), League of the South, Loyal White Knights of the Ku Klux Klan (or Loyal White Knights Church of the Invisible Empire Inc.), Moonbase Holdings, LLC, Nationalist Socialist Movement, Nationalist Front (or Aryan National Alliance), Traditionalist Worker Party, Vanguard America, or any such other social group or organization that has as part of its agenda a racial, religious, or ethnic objective.

ANSWER: None.

4. All Documents and Communications concerning violence, intimidation, or harassment of Persons on the basis of race, religion, or ethnicity, including but not limited to, ethnic cleansing, white genocide, a white ethno-state, or any other form of large or small scale violence.

ANSWER: None.

5. For any Social Media account You had from January 1, 2015, to the present: i. Documents and Communication sufficient to show the account home page, and all uses of Social Media for that account that reference or concern the Events or Defendants in any way. ii. Documents and Communication sufficient to show all Your “friends” and/or “social connections” maintained on Your account, including their names, addresses, and social network usernames or handles.

ANSWER: None other than as answered above.

6. All Documents concerning and all Communications concerning or with any Plaintiff or Defendant (other than You) named in the Amended Complaint, and any other Person who attended, planned or was involved in the Events.

ANSWER: None.

7. All Documents and Communications concerning any lawsuits, claims of violence, or arrests relating to or arising out of racially, ethnically, or religiously motivated conduct by You or any Defendant named in the Amended Complaint.

ANSWER: None other than items responsive to above requests.

8. All Documents and Communications concerning the steps you have taken to preserve Documents and Communications relevant to the lawsuit, including the Documents and Communications responsive to these Requests.

ANSWER: None other than items responsive to above requests.

Respectfully Submitted and as to Objections:

s/ James E. Kolenich PHV

James E. Kolenich

Ohio Bar Number: 0077084

Attorney for Jason Kessler

Kolenich Law Office

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(513) 444-2150

(513) 297-6065 (fax)

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on **April 6, 2018** **via email** upon: Mr. Yotam Barkai, Esq., Ms. Sequin Strohmeier Esq. **Attorneys for Plaintiffs** as follows: email: YBarkai@bsfilp.com; [ssstrohmeier@kaplanandcompany.com](mailto:sstrohmeier@kaplanandcompany.com)

s/ James E. Kolenich PHV
James E. Kolenich

Nathan Damigo

Signature [Signature]

Date 4-6-2018
Acknowledgment

STATE OF New York

Personally appeared before me Nathan Damigo on April 6, 2018 (date) and did swear that the above responses to interrogatories and requests for production of documents are true and correct to the best of his knowledge on the date listed in this acknowledgement.




Lisa M Jarosz
Notary Public

Printed Name: Lisa M. Jarosz

My Commission Expires: 08/18/2018










Lisa M. Jarosz
Notary Public, State of New York
Reg. #01JA6309821
Qualified in Erie County
Commission Expires 08/18/2018



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channels and
recommendations!

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 uploaded a video**LEGAL DEFENSE FUND**

6:22

**Identity
Evropa**3.2K views •
5 months agoIdentity Evropa,
 uploaded a video**ARGUING:
INDIANS**11K views •
1 year ago



IF YOU'RE RACIST, THE WORLD SHOULD KNOW

Nathan Damigo

Nathan Damigo

Overview

Nathan Damigo founded (<https://www.nytimes.com/2017/08/04/education/edlife/antifa-collective-university-california-berkeley.html?mcubz=0>) the campus white nationalist organization, Identity Evropa (IE) (<http://www.canarymission.org/organizations/identity-evropa/>). He is a promoter of anti-Semitic conspiracy theories and racial hatred.

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Shares

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Damigo said (<https://www.nytimes.com/2017/08/04/education/edlife/antifa-collective-university-california-berkeley.html?mcubz=0>) he began reading the works of white nationalists Jared Taylor (https://en.wikipedia.org/wiki/Jared_Taylor) and David Duke (https://en.wikipedia.org/wiki/David_Duke) while serving four years in prison for armed robbery. After prison, Damigo enrolled at California State University, Stanislaus (Stanislaus State), where he was a Social Science major as of August 2017.

(https://
u=)

(https://

Damigo founded IE in early 2016 and, as of August 2017, the movement reportedly had (<https://www.nytimes.com/2017/08/04/education/edlife/antifa-collective-university-california-berkeley.html?mcubz=0>) "450 dues-paying members on dozens of campuses." Damigo goes by the name on Twitter. is a slang term for "fascist."

(https://
url=)

(//www.

Damigo resigned as the CEO of IE on August 27, 2017.

url=)

Damigo gained notoriety for punching () a female Antifa activist in the face during a brawl between white nationalists and radical leftists in April 2017.

Damigo served (<https://www.nytimes.com/2017/08/04/education/edlife/antifa-collective-university-california-berkeley.html?mcubz=0>) two tours of duty in Iraq with the United States Marine Corps, which he joined after high school.

Anti-Semitism

On August 4, 2017, Damigo tweeted : "If it wasn't clear enough that communism and anarchy are just two sides of the same Jewish shekel."

Damigo uses the anti-Semitic “echoes” trope (https://en.wikipedia.org/wiki/Triple_parentheses) that puts three parentheses around a (((name))) to indicate the person is a Jew or part of some nefarious Jewish conspiracy.

On May 29, 2017, Damigo tweeted [REDACTED]: “An ‘anti-semite’ is one who notices (((coincidences))) and are critical of them.”

On March 11, 2017, Damigo tweeted [REDACTED]: “The negative influence of Jewish power, culture, & political activism on Western Civilization & the European people.” His tweet was in response to a tweet (<https://twitter.com/StefanMolyneux/status/840564814854393856>) that read: “What would you like me to cover next on the show?”

On February 1, 2017, Damigo tweeted [REDACTED]: “Anti-whitism is rampant in the Jewish community (you know, the ‘Intolerant left’).”

On December 31, 2016, Damigo tweeted [REDACTED] shares “#FakeNews from @Bernstein. Toast ≠ ‘Nazi Salute’ (((lügenpresse))) at it again.” The term (https://www.washingtonpost.com/news/worldviews/wp/2016/10/24/the-ugly-history-of-luegenpresse-a-nazi-slur-shouted-at-a-trump-rally/?utm_term=.fd987fb4e686) “Lügenpresse,” which means “lying press” in German, was a common Nazi slogan. 6

On November 30, 2016, Damigo tweeted [REDACTED]: “The Jewish community must challenge the chronic anglophobia in their midsts! #JewishFragility.” (https://

On November 27, 2016, Damigo tweeted [REDACTED]: “Birds of a (((feather))) flock together.” His tweet showed progressive Jewish politicians Bernie Sanders and Jill Stein. (https://url=)

Spreading Hate

On August 4, 2017, Damigo tweeted [REDACTED]: (//www.url=) “Holograms: doing the jobs Mexicans are too lazy to do.”

On May 8, 2017, Damigo tweeted [REDACTED]: “Identity Shopping is a neoliberal, #AntiWhite scam used to destroy a people. Jews, nor Blacks, are White or Western.”

White Nationalist Ideologue

On December 6, 2016, Damigo was interviewed by The Young Turks (TYT) where he said that white-only states “might perhaps be the ideal” solution for the United States.

TYT asked [REDACTED] (5:37) Damigo: “So you think the solution is we designate certain nations, maybe certain states in the United States as white states?” Damigo responded: “I think that might perhaps be the ideal in a way and to give people options. Then these people could have their utopia and we could have ours.”

Damigo added ([REDACTED]) (6:27) later that: "we have received a world in which we are being replaced" and went on to criticize American higher education for lauding "diversity" and teaching biases against white people.

Damigo had also said ([REDACTED]) (0:45): "I think if we change our values, if we realize racial, ethnic and religious diversity in a political system actually creates a very hostile atmosphere, then I think we'll start moving towards policies that begin to move us away from that."

Identity Evropa

Identity Evropa (IE) is an American white nationalist campus organization founded in March of 2016 by Nathan Damigo (<http://www.canarymission.org/individuals/nathan-damigo/>).

As of August 4, 2017, IE reportedly had (<https://www.nytimes.com/2017/08/04/education/edlife/antifa-collective-university-california-berkeley.html?mcubz=0>) "450 dues-paying members on dozens of campuses." 6
IE is based ([REDACTED]) in Oakdale, California and is recognized Shares
(<https://pbs.twimg.com/media/DFXINNCU0AA9quQ.jpg>) among white nationalists as an "identitarian"
(https://en.wikipedia.org/wiki/Identitarian_movement) group. 6

IE is known for its anti-Semitic ([REDACTED]) leadership (https://) for partnering ([REDACTED]) with other white nationalist organizations and for its provocative disruptions ([REDACTED]) and public rallies. A slogan ([REDACTED]) often used by the organization, "You Will (https://) Not Replace Us," is a call to action against people of color. The chant became well-known ([REDACTED]) following the violent Charlottesville, Virginia rallies of August 11-12, 2017. White nationalists in Charlottesville also chanted ([REDACTED]) "Jews will not (https://) replace us!" and IE activists who attended (<http://www.canarymission.org/individuals/peter-cvjetanovic/>) the rallies yelled ([REDACTED]) "f**k you faggots!" and the Nazi-era "blood and soil" chant (https://en.wikipedia.org/wiki/Blood_and_Soil).

IE campus activism features distinct posters (<https://pbs.twimg.com/media/DFXINNCU0AA9quQ.jpg>) showing (//www. url=) white Greek and Roman marble statues and slogans ([REDACTED]) like "PROTECT YOUR HERITAGE" and "OUR DESTINY IS OURS." IE tweets ([REDACTED]) the hashtag "#FashTheCity," using the term "Fash" as short for fascist.

Social Media and Web Links

Twitter: [REDACTED]

Youtube: [REDACTED]
[REDACTED]

Website: [REDACTED]



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Shares

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(https://
url=)(//www.
url=)**Occupation:** Student**University:****Organizations(s):** Identity Evropa, Identity Evropa**Close Connections(s):****Last Modified:** 26/03/2018

Photos & Screenshots

Tweets
7,822Following
354Followers
18.7KLikes
4,859[Follow](#)

Fire starter.

[View broadcasts](#)[Joined December 2014](#)

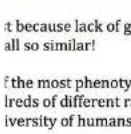
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others**HolyAngel...**[Follow](#)Followed by
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and others**Sede Vaca...**[Follow](#)

Find people you know

Import your contacts from
Gmail[Connect other address books](#)

Trends for you

[Change](#)

Kyrie

Kyrie Irving will miss the rest
of the season and playoffs

#ThursdayThoughts

94.6K Tweets

#TheMasters

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]